

Lobbyist Policy

This policy applies to all YWCA Hamilton Employees, Contractors, Students & Volunteers

1. PURPOSE

The purpose of this policy is to ensure that YWCA Hamilton conducts all lobbying activities ethically, transparently, and in compliance with the Broader Public Sector Accountability Act (BPSAA) and the Lobbyists Registration Act (Ontario). This policy establishes clear guidelines for engaging in lobbying activities

2. SCOPE

This policy applies to all employees, contractors, board members, and any individuals or entities acting on behalf of YWCA Hamilton. It governs activities intended to influence government decisions, policies, or programs; communications with elected officials, public servants, and other public office holders; and engagement of third-party lobbyists or consultants.

3. DEFINITIONS

Lobbyist: Under Section 1(1) of the BPSAA: “lobbyist” means an individual who acts as a consultant lobbyist within the meaning of section 4 of the Lobbyists Registration Act, 1998, and does not include an in-house lobbyist within the meaning of section 5 or 6 of that Act. In plain language: A lobbyist is someone hired externally (a consultant lobbyist) who communicates with public office holders to influence government decisions. It does not include employees whose role involves lobbying tasks within their own organization (in-house lobbyists).

Public Office Holder: Includes elected officials, their staff, public servants, and employees of government agencies or Crown corporations.

Lobbyists Registration Act (Ontario): Provincial legislation requiring registration of lobbying activities to ensure transparency and accountability.

4. RESPONSIBILITIES

The Vice President, Finance & Asset Management is responsible for:

Owning the policy, overseeing implementation, ensuring compliance with applicable legislation, and coordinating reporting to the CEO.

The Director of Finance is responsible for:

Policy stewardship, responsible for drafting, annual updates, maintaining records, and operationalizing the policy.

The Chief Executive Officer is responsible for:

Approving the policy, approves all lobbying activities, ensures alignment with strategic goals, and signs off on all contracts with consultant lobbyists.

Employees and Board members are responsible for:

Reporting any planned lobbying activities to the CEO and adhering to this policy.

Third-party lobbyists are responsible for:

Acting in accordance with this policy and registering lobbying activities as required by the Lobbyists Registration Act (Ontario).

5. POLICY STATEMENT

YWCA Hamilton is committed to conducting lobbying activities that comply with legislation, promote transparency, uphold integrity, and avoid conflicts of interest. In accordance with the BPSAA, YWCA Hamilton will not use public funds to engage consultant lobbyists unless explicitly permitted by law or government directive.

6. POLICY

YWCA Hamilton will ensure all lobbying activities are conducted in accordance with the following principles:

- Full compliance with the BPSAA and the Lobbyists Registration Act (Ontario).
- Transparency through documentation and disclosure of all lobbying activities.
- Upholding the highest ethical standards to maintain public trust.
- Avoidance of real, perceived, or potential conflicts of interest.
- Prohibition on the use of public funds for consultant lobbyists unless permitted by law or government directive.
- Maintaining accurate and detailed records of all lobbying communications and engagements for at least seven years.

7. PROCEDURE

Step 1: Pre-Approval

- All lobbying activities must be pre-approved by the CEO. Requests for approval must include the purpose, public office holders to be contacted, and desired outcome.

Step 2: Registration and Disclosure

- In-house and consultant lobbyists must comply with the Lobbyists Registration Act (Ontario), including registering lobbying activities with the Ontario Lobbyists
- Registry if required. Documentation: Maintain accurate and detailed records of all lobbying activities, including agendas, minutes, correspondence, and contracts with consultant lobbyists. Records must be retained for a minimum of seven years.
- Prohibited Activities: Unauthorized lobbying, conflicts of interest, and offering gifts or benefits to public office holders are strictly prohibited.

Step 3: Reporting and Monitoring

- The CEO will provide an annual report to the Board of Directors summarizing lobbying activities. Periodic reviews will ensure compliance with this policy.

8. REFERENCES

Broader Public Sector (BPS) Accountability Act.
Lobbyists Registration Act (Ontario)

9. RELATED DOCUMENTS

Delegation of Authority (DOA) Policy
Code of Conduct Policy

Approved by:

Medora Uppal, Chief Executive Officer